

HARRIS
ST. LAURENT

July 31, 2020

BY ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

The extension request is so ordered.

Alvin K. Hellerstein /s/
July 31, 2020

Re: United States v. David Wagner, et. al., 19-cr-437 (AKH)

Dear Judge Hellerstein:

My firm represents defendant Marc Lawrence in this matter.

Pursuant to this Court's Order dated July 31, 2020 (Docket No. 72), I write to update the Court regarding Mr. Lawrence's continued efforts to search for a third financially responsible person to co-sign his personal recognizance bond.

Since our last update to the Court on July 17, 2020, Mr. Lawrence's latest prospect declined to sign his bond after speaking with her attorney. Mr. Lawrence continues to search for a third co-signer.

We have discussed Mr. Lawrence's efforts with the Government (AUSA Jilan Kamal and AUSA Sagar Ravi), and they have no objection to an additional two-week extension for Mr. Lawrence to continue his search. Accordingly, we ask the Court to allow Mr. Lawrence to remain at liberty with two co-signers pending the results of his continued search for another financially responsible person. We will update the Court regarding Mr. Lawrence's continued efforts no later than later than August 14.

Respectfully,



Andrew St. Laurent

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)